

PAM BASSEL STANDING CHAPTER 13 TRUSTEE

Bar No.01344800
860 Airport Freeway, Ste 150
Hurst, TX 76054
Phone: (817) 916-4710

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

CASE NO.: 23-43706-MXM-13

ANNALEASE BRASWELL

AKA: ANNALEASE FREEMAN BRASWELL
3121 WAYFARER RD
BEDFORD, TX 76021
SSN/TIN: XXX-XX-5519

DEBTOR

TRUSTEE'S OBJECTION TO MODIFICATION (AND PLAN MODIFICATION IF REQUIRED)

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Objection to Modification of Chapter 13 Plan after Confirmation under 11 U.S.C. Section 1329 and Section 1325. Trustee would respectfully show the Court as follows:

The Debtor's modification provides for the following:

<u>Start Date</u>	<u>Pmt Amt</u>	<u>Frequency</u>	<u># of Periods</u>
11/03/2024	\$2,500.00	Monthly	50

Debtor's projected monthly surplus per Schedules I and J is \$1,950.17.

Trustee requests updated Schedules I and J with supporting income records to determine whether the modification meets the requirements of Sections 1325 & 1329.

WHEREFORE, Trustee prays that the modification be DENIED and for general relief.

Respectfully submitted,

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright, Staff Attorney
Bar No. 24068273
PAM BASSEL STANDING CHAPTER 13 TRUSTEE
Bar No. 01344800
860 Airport Freeway, Ste 150
Hurst, TX 76054
(817) 916-4710 Phone

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright

Annalease Braswell
3121 Wayfarer Rd
Bedford, TX 76021